

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

TOSHIBA INTERNATIONAL  
CORPORATION,

Plaintiff,

v.

SUDHAKAR KALAGA, an  
individual, KIT CONSTRUCTION  
SERVICES, INC., KIT  
PROFESSIONALS, INC.,  
SKBP VENTURES, LLC, and  
SVSRK ENTERPRISES, LLC,  
RUDOLPH CULP, as independent  
administrator of the ESTATE OF  
PABLO D'AGOSTINO, and  
PD RENTALS, LLC,

Defendants.

CIVIL NO. 4:19-CV-04274

**AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff, Toshiba International Corporation (“Toshiba”), Sudhakar Kalaga, KIT Construction Services, Inc. (“KIT Construction”), KIT Professionals, Inc. (“KIT Professionals”), SKBP Ventures, LLC (“SKBP”), and SVSRK Enterprises, LLC (“SVSRK”)(collectively, the “Kalaga Defendants”), and Rudolph Culp, as the Temporary Independent Administrator of the Estate of Pablo D’Agostino (“the Estate”)(collectively, the “Parties”) respectfully request that this Court enter the proposed Agreed Protective Order—attached hereto as **Exhibit 1**—limiting the use an disposition of the information and documents produced in the course of discovery

in this action. The discovery that is likely to be sought includes requests for information of a highly sensitive and confidential nature, including requests for business, commercial, financial, personal, and trade secret information of the Parties. As a result, the Parties have jointly agreed to the attached Agreed Protective Order, and request that the Court enter it in this case.

Respectfully submitted,

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SVSRK ENTERPRISES, LLC.**

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***Temporary Independent Administrator of the Estate of Pablo  
D'Agostino***

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct of the above and foregoing filed via the CM/ECF system which caused service upon all parties on January 6, 2020.

/s/ Jennifer Brevorka

Jennifer Brevorka